

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

PHENIX LONGHORN LLC,

Plaintiff,

v.

AU OPTRONICS CORPORATION,  
HISENSE ELECTRONICA MEXICO,  
S.A. DE C.V., HISENSE USA  
CORPORATION, HISENSE VISUAL  
TECHNOLOGY CO., LTD., and DOES 1–10,

Defendants.

**CIVIL CASE NO. 2:23-cv-00477-RWS-RSP**

**JURY TRIAL DEMANDED**

PHENIX LONGHORN LLC,

Plaintiff,

v.

INNOLUX CORPORATION and  
DOES 1–10,

Defendants.

**CIVIL CASE NO. 2:23-cv-00478-RWS-RSP**

**JURY TRIAL DEMANDED**

**DECLARATION OF JANICE TA IN SUPPORT OF  
DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF**

I, Janice L. Ta, declare and state as follows:

1. My name is Janice L. Ta. I am counsel for Defendant AUO and Hisense Visual Technology Co., LTD in the above-captioned matter. I am at least eighteen (18) years of age, have personal knowledge of, and am competent to testify to, the facts stated herein (or am aware of such facts upon information and belief based on my experience and inquiry into this matter. This declaration is submitted in support of Defendants' Responsive Claim Construction Brief.

2. Attached as Exhibit A is a true and correct copy of the Claim Construction Memorandum and Order signed by Judge Robert W. Schroeder III in Lead Case No. 2:17-cv-00711, *Phenix Longhorn LLC v. Winstron Corporation*, dated June 21, 2019.

3. Attached as Exhibit B is a true and correct copy of the Decision Denying Institution of *Inter Parties* Review in Case No. IPR2018-01255, Paper No. 14, dated January 24, 2019.

4. Attached as Exhibit C is a true and correct copy of an excerpt from the Authoritative Dictionary of IEEE Standards Terms (Seventh Edition).

5. Attached as Exhibit D is a true and correct copy of the Declaration of Paul S. Min, Ph.D. Regarding Claim Construction for U.S. Patent Nos. 7,233,305 and 7,557,788, dated May 8, 2025.

6. Attached as Exhibit E is a true and correct copy of the Declaration of Aris Silzars Regarding Claim Construction for U.S. Patent Nos. 7,233,305 and 7,557,788, dated May 7, 2025.

7. Attached as Exhibit F is a true and correct copy of the Declaration of Joseph McAlexander in Support of Plaintiff's Claim Construction Positions Relating to Definiteness, dated May 8, 2025.

8. Attached as Exhibit G is a true and correct copy of the Decision Denying Institution of *Inter Parties* Review of U.S. Patent No. 7,557,788 in Case No. IPR2025-00044, dated June 9,

2025.

9. Attached as Exhibit H are true and correct copy of excerpts from the deposition of Aris Silzars, taken on June 10, 2025.

10. Attached as Exhibit I are true and correct copy of excerpts from the deposition of Paul Min, taken on June 12, 2025.

11. Attached as Exhibit J is a true and correct copy of an excerpt from the file history for U.S. Patent No. 7,233,305, dated February 21, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

Dated and signed this 14<sup>th</sup> day of July, 2025, in Boone, North Carolina.

  
/s/\_\_\_\_\_  
Janice L. Ta